

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA**

CRAIG MIMS p/k/a JUJU BEATZ, an
individual,

Plaintiff,

vs.

CASE NO.

JONATHAN LYNDAL KIRK p/k/a
DABABY, an individual; RODRICK
WAYNE MOORE, JR. p/k/a RODDY
RICCH, an individual; ROSS JOSEPH
PORTARO IV p/k/a
SETHINTHEKITCHEN, an individual;
CAROLINE DIAZ a/k/a BAROLINE DIAZ,
an individual; PROJECT DREAMS
ENTERTAINMENT, LLC d/b/a PROJECT
DREAMS PUBLISHING; SOUTH COAST
MUSIC GROUP LLC d/b/a SOUTH
COAST MUSIC GROUP; UNIVERSAL
MUSIC GROUP, INC.; WARNER
CHAPPELL MUSIC, INC.; and UMG
RECORDINGS, INC.

Defendants. /

**COMPLAINT FOR COPYRIGHT INFRINGEMENT
DEMAND FOR JURY TRIAL**

Plaintiff Craig Mims p/k/a JuJu Beatz (hereinafter, “Mims” or “Plaintiff”), by and through his undersigned counsel, and pursuant to the Federal Rules of Civil Procedure, hereby sues the Defendants, and in support, alleges as follows:

Subject Matter of Suit

1. This action arises under the Copyright Act, 17 U.S.C. §§501, et. seq., and contains substantial claims that arise under federal law. Plaintiff, author of his own musical composition titled “Selena,” asserts his copyright rights in his musical composition against Defendants who

copied his song without authorization.

Jurisdiction and Venue

2. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the claims asserted by Plaintiff arises under the Copyright Act.

3. As more fully set forth below, this Court has personal jurisdiction over each of the Defendants, because Defendants have committed acts of copyright infringement that have harmed Plaintiff in this District, including, inter alia, purposefully directing advertising, sales, distributions, performances, or digital transmissions of their recordings, including the infringed upon work, to citizens and consumers of the State of Florida.

4. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400 because at least one of the defendants resides in this District, and a substantial part of the events or omissions giving rise to the claim occurred, or a substantial part of the intellectual property that is the subject of the action is situated, in this District, and the defendants are subject to personal jurisdiction in this District.

Parties

5. Plaintiff Mims is a resident of the State of Florida that lives within this judicial district.

6. Plaintiff is a music producer who creates original musical compositions consisting of melodies and beats.

7. Defendant, Jonathan Lyndale Kirk, professionally known as DaBaby (“DaBaby”), is a resident of the State of Louisiana.

8. Defendant DaBaby is a well-known American rapper who rose to fame and whose music achieved commercial success within the last few years. “Rockstar,” the song at issue in this

lawsuit, arguably was a catalyst that helped lead to such fame and propelled him to have substantial commercial success.

9. Defendant DaBaby has traveled to and performed in Florida, including in this District, multiple times, including, inter alia, to perform the infringing musical work, “Rockstar.”

10. Defendant DaBaby owns publishing company Project Dreams Entertainment, LLC, a California limited liability company with an office in Los Angeles, California.

11. Project Dreams Entertainment, LLC does business as Project Dreams Publishing (“Project Dreams Publishing”).

12. Upon information and belief, Defendant DaBaby either owns another entity or does business as Baby Jesus Publishing.

13. Baby Jesus Publishing is identified as having an ownership interest or financial stake in the infringing musical work, “Rockstar.”

14. Defendant Rodrick Wayne Moore, Jr., professionally known as Roddy Ricch (“Roddy Ricch”), is a resident of the State of Louisiana.

15. Defendant Roddy Ricch is a well-known American rapper, who is known to associate with DaBaby and is also featured on “Rockstar.”

16. Defendant Roddy Ricch has traveled to and performed in Florida, including in this District, multiple times, to perform the infringing musical work, “Rockstar.”

17. Defendant Ross Joseph Portaro IV, professionally also known as SethInTheKitchen (“Portaro”), is a resident of the State of Louisiana.

18. Defendant Portaro is a music producer who creates musical compositions in a similar capacity as Plaintiff.

19. Defendant Portaro produces musical compositions for Defendant DaBaby and was

instrumental in the production of the infringing musical work, “Rockstar.”

20. Defendant Portaro takes credit for writing “Rockstar” together with Roddy Ricch and DaBaby.

21. Defendant Portaro has traveled to Florida in connection with his music production business, multiple times, including within this District.

22. South Coast Music Group, LLC, d/b/a South Coast Music Group (hereinafter, “South Coast”) is a North Carolina limited liability company, with an office in Charlotte, North Carolina.

23. South Coast has infringed Plaintiff’s copyright rights, because it has produced and distributed the phonorecords containing the infringing “Rockstar” song, including, inter alia, into this District.

24. Universal Music Group, Inc. (“Universal Music Group”) is a Delaware corporation with a place of business in Santa Monica, California.

25. Universal Music Group does business in Florida, including in this judicial district, and has an office in Miami-Dade County, Florida.

26. Interscope Records is a U.S. record label, and a division of Universal Music Group. Upon information and belief, Interscope Records is not a separate, independent business entity from Universal Music Group.

27. Defendant Caroline Diaz a/k/a Baroline Diaz (“Diaz”), is Vice President of Universal Music Group’s Interscope Records.

28. Defendant Diaz resides in New York, but travels regularly to South Florida on business in connection with her position as Vice President of Interscope Records.

29. Defendant UMG Recordings Inc. (“UMG”), is a Delaware corporation with offices

in Santa Monica, California. UMG is registered to do business in the State of Florida, and has a registered agent in this District.

30. UMG does business under the name “Capital Music Group”, which serves as an unincorporated umbrella label for other sub-labels and businesses owned by UMG.

31. UMG, and at all times relevant herein, was responsible for the distribution and transmission of “Rockstar.”

32. Warner Chappell Music, Inc. (“Warner Chappell”) is a Delaware corporation with offices in several locations throughout the United States, including within this judicial district.

33. Warner Chappell is registered to do business in Florida and has an office in Miami-Dade County, Florida.

34. At all times material herein, each of the Defendants was the agent and employee of some or all of the other Defendants and in doing the things herein alleged, were acting within the course and scope of such agency and employment relationship.

Factual Background

35. Plaintiff Mims has been creating original musical works for more than five (5) years and routinely markets his music to those who engage in the commercialization and monetization of music such as record labels, music publishing companies, and other musicians who pay to license and use Plaintiff's original musical works of authorship.

36. “Beats” in Hip Hop music or rap, refers to the rhythmic beat of drum(s) underlying a musical composition. The beats can be created by actual drums, but are often created using synthesizers.

37. Plaintiff has created musical compositions, including beats, and has routinely marketed them to those who engage in the commercialization and monetization of music such as

record labels, music publishing companies, and other musicians who pay to use and license Plaintiff's music.

38. Plaintiff markets his musical compositions through several means, including, the internet, email communications, and social media platforms like Instagram.

39. Plaintiff's musical compositions are created for the purpose of merging them into inseparable and completed sound recordings with the addition of lyrics or "musical words."

40. Thus, many musical compositions that are commercially released into the market, have an artist that created the lyrics, another artist that created the musical notes for the melody and another artist that created the musical score for the beats or rhythm portion.

41. Artists signed to the various record labels choose which compositions they will write lyrics to accompany the musical score. The labels that release the completed sound recording share rights in the music they create. Sound recordings are then released mainstream for financial gain by the record labels, music distributors and other third parties.

42. Plaintiff registers his beats through the United States Copyright Office because his beats are clearly defined as copyrightable material pursuant to the United States Copyright Act.

43. Defendants DaBaby and Roddy Ricch are popular hip-hop musical artists who have each achieved mainstream and financial success in the music industry.

44. Defendants DaBaby and Roddy Ricch routinely compose music by using beats created by others, and then adding their own vocals that are merged into sound recordings.

45. Income is generated via many sources from licensing of sound recordings to other artists, television production, movie soundtracks and general royalty collection from streaming and song sales.

46. Defendant Portaro is a music producer like Plaintiff who creates music beats.

47. Defendant Portaro provides beats to musicians for the creation of sound recordings.

48. Defendant Portaro has a working relationship and provides beats to Defendants DaBaby and Roddy Ricch for the creation of completed sound recordings.

49. Entities like the other named corporate Defendants then pay large sums of monies to these music creators for rights in their works.

50. These corporate Defendants distribute and disseminate the sound recordings through various media.

51. These rights allow the holders to collect revenues from the sound recordings in the form of royalties.

52. In 2019, Plaintiff began communicating with Defendant Diaz, in an official capacity as Vice President of Interscope Records who is known to associate with Defendant DaBaby specifically regarding his professional music career.

53. At this same time, Plaintiff also began direct, email communications with representatives of DaBaby using the email address billiondollarbabybeats@gmail.com.

54. Plaintiff provided his musical composition known as *Selena* to Defendants in 2019 who then used *Selena* to create a sound recording entitled “Rockstar.”

55. Defendant Diaz and DaBaby's representative accessed Plaintiff's *Selena* on more than 40 occasions in late 2019 and early 2020.

56. On, or around April of 2020, Defendants DaBaby, Roddy Ricch, and Portaro released, through the other named Defendants, a sound recording titled “Rockstar” that included many compositional elements from Plaintiff's *Selena* composition.

57. The song “Rockstar” went on to achieve huge financial success and is listed as one of the most popular songs of 2020. It has earned millions of dollars through royalty generation,

licensing, and other sources of revenues.

58. Defendants have illegally and without permission sampled Plaintiff's *Selena* musical work and have continued to collect substantial revenues without even notifying Plaintiff or paying Plaintiff for his contributions. Plaintiff has never received any compensation for Defendants' illegal and unauthorized use of his *Selena* musical composition.

59. Plaintiff made numerous attempts to resolve this matter short of litigation, but such efforts were unsuccessful due to Defendants' unwillingness to cooperate or accept responsibility for blatant and willful copyright infringement. Plaintiff had no choice but to bring this action to redress and stop Defendants willful infringement that is causing ongoing harm.

COUNT I

COPYRIGHT INFRINGEMENT

60. Plaintiff incorporates by reference herein all of the allegations of paragraphs 1 through 59 as if fully set forth in this paragraph.

61. Plaintiff is the creator and legal and beneficial owner of a musical composition entitled "Selena," which is subject of a valid Certificate of Copyright Registration issued by the Register of Copyrights, Registration No. SRu001426125. A copy of the Certificate is attached hereto as **Exhibit A**.

62. Defendants had ready access to Plaintiff's work and specially accessed "Selena" on more than 40 separate occasions over a period of several weeks before the eventual release of the infringing track "Rockstar."

63. On or around April of 2020 Defendants released a song/track entitled "Rockstar" on an album entitled "Blame it on Baby" performed by Defendants DaBaby and Roddy Ricch.

64. Defendants unauthorized use and copying of Plaintiff's composition has rendered Defendants' infringing work substantially similar to and in many portions identical to Plaintiff's

musical composition.

65. Defendants' song/track "Rockstar" infringes Plaintiff's composition "Selena."

66. Defendants have directly infringed upon Plaintiffs' copyright through the reproduction, distribution, performance, display, and creation of derivative works of Plaintiff's "Selena" musical work in violation of the Copyright Act.

67. Defendants have induced, caused, or materially contributed to the infringement of Plaintiffs' copyright, including through their authorization of further creation, distribution, and performances of the infringing "Rockstar" song, and accordingly, Defendants are contributorily liable for such infringement.

68. Defendants all benefited financially from the distribution of the infringing musical work "Rockstar."

69. Defendants did not seek or receive any authorization or permission from Plaintiff to use any portion of Plaintiff's "Selena" composition.

70. Defendants have willfully and unlawfully infringed on Plaintiff's copyright in "Selena" and have converted the copyrighted material for their own use to the detriment of Plaintiff.

71. Defendants have produced, reproduced and prepared derivative works based upon Plaintiff's work "Selena."

72. Defendants have distributed and profited from Plaintiff's copyrighted work.

73. Defendants' unauthorized reproductions, distributions, public performances, and/or digital transmissions of the infringing "Rockstar" works as alleged above, each constitute an infringement of Plaintiff's rights in and to the works.

74. Defendants have the right to control other infringers and have received direct

benefit from that infringement. Accordingly, Defendants are vicariously liable for such infringement.

75. The foregoing acts of copyright infringement have been willful and intentional.

76. As a direct and proximate result of Defendants' infringement of Plaintiff's copyright, as alleged herein, pursuant to 17 U.S.C. Section 504(b), Plaintiff is entitled to his actual damages, including Defendants' profits from infringement, the exact amount of which is not currently known.

77. Defendants DaBaby and Roddy Ricch have subsequently performed the infringing "Rockstar" musical work, and have profited from their live performance of the Plaintiff's copyright work (the "Live Performances").

78. Defendants' Live Performances constitute separate acts of copyright infringement for which Plaintiff is entitled to seek damages and injunctive relief.

79. Plaintiff is also entitled to recover attorney's fees and costs pursuant to 17 U.S.C. § 505, and prejudgment interest according to law.

80. Defendants are causing, and unless enjoined by the Court will continue to cause Plaintiff irreparable harm for which he has no adequate remedy at law. Plaintiff is entitled to an injunction under 17 U.S.C. § 502 prohibiting the continued infringement of his musical composition.

COUNT II

DECLARATORY AND INJUNCTIVE RELIEF

81. Plaintiff incorporates by reference herein all of the allegations of paragraphs 1 through 59 as if fully set forth in this paragraph.

82. Plaintiff seeks declaratory and injunctive relief pursuant to 17 U.S.C. § 502.

83. Plaintiff seeks a declaratory judgment that Defendants do not have the right to exploit the

infringing musical work “Rockstar” without Plaintiff’s written approval, and that any further unauthorized exploitation of the infringing musical work “Rockstar” constitutes willful copyright infringement.

84. Plaintiff seeks a permanent injunction enjoining further reproduction, sale, performance, or other use or exploitation of the infringing musical work “Rockstar” and all other derivative works.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against all of the Defendants as follows:

- (a) an award for damages pursuant to 17 U.S.C. § 504(b), or in the alternative an award for the maximum statutory damages of \$150,000 per infringement pursuant to 17 U.S.C. § 504(c);
- (b) an order that each Defendant provide to Plaintiff a complete and accurate accounting of any and all profits earned in connection with their exploitation of the infringing musical work “Rockstar” ;
- (c) an order preliminarily and permanently enjoining each Defendant, its/her/his agents, servants, employees, and all parties in privity with them, from directly and indirectly using the infringed musical work “Rockstar”, or any other work derived in any way therefrom, in any manner which infringes on the copyright, including, without limitation a prohibition against the reproduction, sale, distribution, dissemination, public performance, or other use or exploitation, of the infringing work and all other derivative work;
- (d) a finding that Defendants’ infringements were willful, in accordance with 17 U.S.C. Section 504(c)(2);

- (e) an award of costs, including a reasonable attorney's fees, pursuant to 17 U.S.C. §505;
- (f) the entry of final judgment that includes pre and post-judgment interest;
- (g) an award of such other and further relief as the Court deems just, proper, and equitable.

DEMAND FOR TRIAL BY JURY

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff demands trial by jury on all issues so triable.

Dated: December 9, 2022

Respectfully submitted,

By: s/William R. Trueba, Jr.

William R. Trueba, Jr.

Florida Bar No. 117544

wtrueba@lex188.com

Darlene Barron, Esq.

Florida Bar No. 108873

dbarron@lex188.com

TRUEBA & SUAREZ, PLLC

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Miami, Florida 33155

Telephone: (305) 482-1001

Facsimile: (786) 516-2826

Bradley J. Eiseman

Admission Pro Hac Vice Forthcoming

bradeisemanlaw@gmail.com

THE LAW OFFICE OF BRADLEY J. EISEMAN

115 Harbor Common Drive

Memphis, Tennessee 38103

Attorneys for Plaintiff

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS

Craig Mims p/k/a JuJu Beatz, an individual

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

St. Lucie County

(c) Attorneys (Firm Name, Address, and Telephone Number)

TRUEBA & SUAREZ, PLLC
7480 Bird Road, Suite 601, Miami, Florida 33155
(305) 482-1001

(d) Check County Where Action Arose: ☐ MIAMI-DADE ☐ MONROE ☐ BROWARD ☐ PALM BEACH ☐ MARTIN ☒ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE ☐ HIGHLANDS

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- | | | | |
|----------------------------|------------------------------|---------------------------------------|---|
| <input type="checkbox"/> 1 | U.S. Government
Plaintiff | <input checked="" type="checkbox"/> 3 | Federal Question
<i>(U.S. Government Not a Party)</i> |
| <input type="checkbox"/> 2 | U.S. Government
Defendant | <input type="checkbox"/> 4 | Diversity
<i>(Indicate Citizenship of Parties in Item III)</i> |

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

- | | | PTF | DEF | | PTF | DEF |
|--------------------------|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| <input type="checkbox"/> | Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| <input type="checkbox"/> | Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

[Click here for: Nature of Suit Code Descriptions](#)

CONTRACT		TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical			<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability			<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment of Medicare Act	<input type="checkbox"/> 330 Federal Employers' Li- ability			INTELLECTUAL PROPERTY RIGHTS	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans	<input type="checkbox"/> 340 Marine			<input checked="" type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 450 Commerce
(Excl. Veterans)				<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 345 Marine Product Liability	PERSONAL PROPERTY	LABOR	<input type="checkbox"/> 835 Patent – Abbreviated New Drug Application	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 710 Fair Labor Standards Acts	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA)
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 740 Railway Labor Act	SOCIAL SECURITY	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
			<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 891 Agricultural Acts
				<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 893 Environmental Matters
				<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 895 Freedom of Information Act
					<input type="checkbox"/> 896 Arbitration
					<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
					<input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:		<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee		<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence			
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General			
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	IMMIGRATION		
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:	<input type="checkbox"/> 462 Naturalization Application		
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 465 Other Immigration Actions		
		<input type="checkbox"/> 550 Civil Rights			
		<input type="checkbox"/> 555 Prison Condition			
		<input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement			

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed (See V1 below) ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation Transfer ☐ 7 Appeal to District Judge from Magistrate Judgment ☐ 8 Multidistrict Litigation – Direct File ☐ 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case ☐ YES ☒ NO

JUDGE:

b) Related Cases ☐ YES ☒ NO

DOCKET NUMBER:

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause *(Do not cite jurisdictional statutes unless diversity)*:

Copyright Infringement, 17 U.S.C. §§101 et. seq. U.S. Copyright Act of 1976

LENGTH OF TRIAL via 7 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE

SIGNATURE OF ATTORNEY OF RECORD

Dec. 9, 2022

FOR OFFICE USE ONLY : RECEIPT #

AMOUNT

IFP/

JUDGE

MAG JUDGE

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDALÉ KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Jonathan Lyndale Kirk p/k/a Dababy
11009 Astoria Drive
Charlotte, NC 28262

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐
Other *(specify)*:

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

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Civil Action No.

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JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Rodrick Wayne Moore, Jr. p/k/a
RODDY RICCH
138 E 85th Street
Los Angeles, CA 90003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Ross Joseph Portaro IV p/k/a
SETHINTHEKITCHEN
3217 Elstree Drive
Charlotte, NC 28226

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Caroline Diaz a/k/a Baroline Diaz
40 W 57th Street
New York, New York 10019

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

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_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*

Project Dream Entertainment, LLC d/b/a
Project Dreams Publishing
10960 Wilshire Blvd. 5th Floor
Los Angeles, CA 90024

By serving its registered agent:

Eresident Agent, Inc.
7801 Folsom Blvd., Suite 202
Sacramento, CA 95826

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

**William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001**

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

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_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDALE KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*

South Coast Music Group, LLC
428 E 4th Street, Suite 409
Charlotte, NC 28202-2491

By serving its registered agent:

M. Heath Gilbert, Jr.
200 Providence Road, Suite 106
Charlotte, NC 28207

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
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_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐
Other *(specify)*:

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
UMG Recordings, Inc.
2220 Colorado Avenue
Santa Monica, CA 90404

By serving its registered agent:
CT Corporation System
1200 S. Pine Island Road
Plantation FL 33324

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
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☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐
Other *(specify)*:

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDALE KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Universal Music Group, Inc.
2200 Colorado Avenue
Santa Monica, CA 90404

By serving its registered agent:
CT Corporation System
300 Montvue Road
Knoxville, TN 37919-5546

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
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☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

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Other *(specify)*:

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF FLORIDA

CRAIG MIMS p/k/a JUJU BEATZ, an individual,

Plaintiffs,

Civil Action No.

v.

JONATHAN LYNDAL KIRK p/k/a DABABY, an individual; RODRICK WAYNE MOORE, JR. p/k/a RODDY RICCH, an individual; ROSS JOSEPH PORTARO IV p/k/a SETHINTHEKITCHEN, an individual; CAROLINE DIAZ a/k/a BAROLINE DIAZ, an individual; PROJECT DREAMS ENTERTAINMENT, LLC d/b/a PROJECT DREAMS PUBLISHING; SOUTH COAST MUSIC GROUP LLC d/b/a SOUTH COAST MUSIC GROUP; UNIVERSAL MUSIC GROUP, INC.; WARNER CHAPPELL MUSIC, INC.; and UMG RECORDINGS, INC.

Defendants.

SUMMONS IN A CIVIL ACTION

TO: *(Defendant's name and address)*
Warner Chappell Music, Inc.
777 S. Santa Fe Ave
Los Angeles, CA 90021

By serving its registered agent:
CT Corporation System
1200 S. Pine Island Road
Plantation FL 33324

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a) (2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William R. Trueba, Jr.
Trueba & Suarez, PLLC
7480 Bird Road, Suite 601
Miami, Florida 33155
Tel: 305-482-1001

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(i))

This summons for *(name of individual and title, if any)* _____
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_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organizational)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for Travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signatures

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Exhibit A

Registration Number

SRu 1-426-125

Effective Date of Registration:

September 26, 2020

Registration Decision Date:

September 28, 2020

Title _____

Title of Work: SELENA

Completion/Publication _____

Year of Completion: 2019

Author _____

- **Author:** Craig Antonio Mims
Author Created: sound recording
Work made for hire: No
Citizen of: United States
Domiciled in: United States
Year Born: 1999

Copyright Claimant _____

Copyright Claimant: Craig Antonio Mims
502 Wickham Pl, Cary, NC, 27513, United States

Certification _____

Name: Craig Antonio Mims Jr.
Date: September 26, 2020

Registration #: SRu001426125
Service Request #: 1-9270774401

Mail Certificate _____

Craig Antonio Mims
502 Wickham Pl
Cary, NC 27513 United States

Priority: Special Handling

Application Date: September 26, 2020

Correspondent _____